

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

SHANNON PEREZ, ET AL.,	§	
	§	
Plaintiffs	§	
	§	
v.	§	CIVIL ACTION NO.
	§	11-CA-360-OLG-JES-XR
STATE OF TEXAS, ET AL.	§	CONSOLIDATED ACTION
	§	[Lead case]
Defendants	§	

TEXAS LATINO REDISTRICTING TASK FORCE, ET AL.
AMENDED PRE-TRIAL EXHIBIT LIST

Plaintiffs Texas Latino Redistricting Task Force, et al. ("Task Force Plaintiffs") submit their amended pre-trial exhibit list pursuant to the Court's Order [Dkt. 1404]. In addition to the Joint Exhibits of the parties, the Task Force Plaintiffs exhibits include:

1. Deposition excerpts: Lon Burnam, May 19, 2014
2. Deposition excerpts: Lon Burnam, June 17, 2014
3. Lon Burnam Deposition Exhibits: 7, 8 (with color original), 9 (with color original), 12-14, 16, 18- 21, 23- 48, 50, 52, 59, 62- 64
4. Deposition excerpts: Charles Geren (May 14, 2014)
5. Deposition excerpts: Gerardo Interiano (May 14, 2014)
6. Deposition excerpts: Gerardo Interiano (January 20, 2012)
7. Deposition excerpts: Conor Kenny (May 30, 2014)
8. Deposition excerpts: Texas Representative Drew Darby (May 20, 2014)
9. Drew Darby Deposition Exhibit 21
10. Deposition excerpts: Texas Senator Kel Seliger (May 20, 2014)
11. Texas Legislative Council Report: HD 90 District Election Analysis by Pct. 14D for HD90

12. Map showing precinct returns for Ramon Romero in the 2014 Democratic Primary for HD90
13. Texas Legislative Council Report: Election Analysis with VTD Subtotals: HD90 – H358, 2014 Democratic Primary Election
14. Texas Legislative Council Report: HD 90 District Election Analysis by Pct. 12D for HD90
15. Texas Legislative Council Report: Election Analysis with VTD Subtotals: HD90 – H358, 2012 Democratic Primary Election
16. Map showing precinct returns for Carlos Vasquez in the 2012 Democratic Primary for HD90
17. City of Fort Worth Neighborhood Database Image: Como Neighborhood Association
18. City of Fort Worth Neighborhood Database Image: Fairmount /Southside Local Historic District
19. Supplemental Expert Report of Richard Engstrom (May 26, 2017)
20. Second Supplemental Expert Report of Henry Flores (May 26, 2017)
21. Supplemental Declaration of Florinda Chavez
22. Photos: Ramon Romero Campaign Workers
23. **H100 Map and Plan Statistics**
 - a. RED-100
 - b. RED-119 (2006-2010, 2007-2011, 2009-2013, 2008-2012, 2011-2015) RED-202 (2008, 2010, 2012, 2014, 2016)
 - c. RED-225 (2008G, 2008DP, 2010DP, 2010RP, 2010G, 2012RP, 2014DP, 2014RP, 2014G, 2016RP, 2016G)
 - d. RED-315
 - e. RED-216 for HD90
24. **H283 Map and Plan Statistics**
 - a. RED-100
 - b. RED-119 (2006-2010, 2007-2011, 2009-2013, 2008-2012, 2011-2015)

- c. RED-202 (2008, 2010, 2012, 2014, 2016)
- d. RED-225 (2008G, 2008DP, 2010DP, 2010RP, 2010G, 2012RP, 2014DP, 2014RP, 2014G, 2016RP, 2016G)
- e. RED-350 Incumbents by District
- f. RED-216 for HD90

25. H292 Map and Plan Statistics

- a. RED-100
- b. RED-119 (2006-2010, 2007-2011, 2009-2013, 2008-2012, 2011-2015)
- c. RED-202 (2008, 2010, 2012, 2014, 2016)
- d. RED-225 (2008G, 2008DP, 2010DP, 2010RP, 2010G, 2012RP, 2014DP, 2014RP, 2014G, 2016RP, 2016G)
- e. RED-350 Incumbents by District
- f. RED-216 for HD90

26. H309 Map and Plan Statistics

- a. RED-100
- b. RED-119 (2006-2010, 2007-2011, 2009-2013, 2008-2012, 2011-2015)
- c. RED-202 (2008, 2010, 2012, 2014, 2016)
- d. RED-225 (2008G, 2008DP, 2010DP, 2010RP, 2010G, 2012RP, 2014DP, 2014RP, 2014G, 2016RP, 2016G)
- e. RED-350 Incumbents by District
- f. RED-216 for HD90

27. Map and Plan Packet: H113 (Rep. Solomons STWD House Proposal)

28. Map and Plan Packet: H203 (Rep. Burnam Tarrant Co. Amend (H-2F-11) PlanH153)

29. Map and Plan Packet: H236 (Rep. Burnam Tarrant Co. Amend (H-2F-12) PlanH203)

30. Map and Plan Packet: H328 (Rep. Burnam Dist 90, 99 Amend SB3 83(1))

31. Map and Plan Packet: H342 (Rep. Burnam Dist 90, 97, 99 Amend SB3 83(1))

32. Texas Legislative Council Report: RED-340 Plan Overlap Analysis H283 to H309
33. Texas Legislative Council Map: HD 90 in H283 and H309
34. Texas Legislative Council Report: RED-340 Plan Overlap Analysis H358 to H309
35. Texas Legislative Council Map: HD 90 in H309 and H358
36. Texas Legislative Council Report: RED-340 Plan Overlap Analysis H100 to H113
37. Texas Legislative Council Map: HD 90 in H100 and H113
38. Texas Legislative Council Report: HD 90 District Election Analysis by Pct. 12D for CD33
39. Texas Legislative Council Report: HD 90 District Election Analysis by Pct. 14D for CD33 and SD10
40. Texas Legislative Council Report: Plan H358 RED-370 (2012 precincts)
41. Texas Legislative Council Report: Plan H309 RED-370 (2012 precincts)
42. Texas Legislative Council Report: Plan H283 RED-370 (2012 precincts)
43. Texas Legislative Council, RED-202 Plan H134
44. Texas Legislative Council Report: RED-216 for HD90 in Plan H358
45. Texas Legislative Council Report: RED-202 PLAN H358 (2010 and 2012)
46. Videotaped Deposition Excerpts of Lon Burnam
47. Declaration of Interpreter re Lon Burnam Deposition Exhibit 64.
48. Deposition excerpts: Richard Engstrom (July 5, 2017)

DATED: July 7th, 2017

Respectfully submitted,

MEXICAN AMERICAN LEGAL DEFENSE
AND EDUCATIONAL FUND

/s/ Nina Perales

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CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of July, 2017, I served a copy of the foregoing document on all counsel who are registered to receive NEFs through this Court's CM/ECF system. All attorneys who are not registered to receive NEFs have been served via email.

/s/ Nina Perales
Nina Perales